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|----|---|---|--|
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| 4 | | | |
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| 7 | Facsimile: (702) 949-1101 | | |
| 8 | Attorneys for Defendant George Timothy Kelly, M.D. | | |
| 9 | UNITED STATES DISTRICT COURT DISTRICT OF NEVADA, SOUTHERN DIVISION | | |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| 13 | ANTHONY K. ANDERSON, an individual, | Case No. 2:21-cv-00514-CDS-EJY | |
| 14 | Plaintiff, | STIPULATION AND ORDER TO EXTEND TIME FOR FILING AMENDED | |
| 15 | V. | COMPLAINT | |
| | NEVADA DEPARTMENT OF | | |
| 16 | CORRECTIONS; HENRY LANDSMAN, M.D. an individual; ROMEO ARANSAS, | | |
| 17 | M.D., an individual; REBECCA KOZLOFF, an individual; SONYA CARRILLO, R.N., an | | |
| 18 | individual; GEORGE TIMOTHY KELLY, M.D., an individual, | | |
| 19 | Defendants. | | |
| 20 | | | |
| 21 | IT IS HEREBY STIPULATED AND AGREED by Plaintiff Anthony K. Anderson | | |
| 22 | ("Plaintiff) and Defendant George Timothy Kelly, M.D. ("Dr. Kelly") that the deadline for Plaintiff | | |
| 23 | to file an amended complaint set forth in the Court's March 31, 2024 Order (ECF No. 89) Granting | | |
| 24 | Dr. Kelly's Motion to Dismiss (ECF No. 66), by and through their respective counsel, be extended | | |
| 25 | by two weeks to Monday April 29, 2024. | | |
| 26 | Good cause exists to extend this deadline. Plaintiff's counsel's firm has been closed since | | |
| 27 | the April 8, 2024 loss of life at a deposition that took place in the same building. Given the | | |
| 28 | extraordinary circumstances, and there being no prejudice that inures to any party, this brief | | |

| 1 | extension is not dilatory nor does it seek undue delay. | | |
|------|---|---|--|
| 2 | WHEREFORE, Plaintiff and Dr. Kelly respectfully request the Court extend the deadline | | |
| 3 | for Plaintiff to file his amended complaint from April 15, 2024 to April 29, 2024. | | |
| 4 5 | | McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP | |
| 6 | | | |
| | I | By: /s/ Cheryl A. Grames | |
| 7 | 7 | Katherine J. Gordon | |
| 8 | 3 | Nevada Bar No. 5813 | |
| 0 | | Cheryl A. Grames Nevada Bar No. 12752 | |
| 9 | ? | Attorneys for Defendant | |
| 10 |) | George Timothy Kelly, M.D. | |
| 11 | | OGLETREE DEAKINS NASH SMOAK & STEWART, PC | |
| 12 | 2 | STEWARCI, I C | |
| 13 | | | |
| 14 | 1 I | By: /s/ Elody C. Tignor | |
| 15 | 5 | Anthony L. Martin, Esq. Nevada Bar No. 8177 | |
| | | Elody C. Tignor, Esq. | |
| 16 | 5 | Nevada Bar No. 15663 | |
| 17 | 7 | Attorneys for Plaintiff Anthony K. Anderson | |
| 18 | | Anthony K. Anderson | |
| | | <u>ORDER</u> | |
| 19 | IT IS SO ODDEDED | | |
| 20 | <i>!</i> | | |
| 21 | DATED: <u>April 15</u> , 2024. | | |
| 22 | | 6 190 00 | |
| 23 | 3 | UNITED STATES MAGISTRATE JUDGE | |
| 24 | 4 | | |
| 25 | 5 | | |
| 26 | 5 | | |
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MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP 8337 WEST SUNSET ROAD, SUITE 350 LAS VEGAS, NV 89113